



Highlights of the RCFE Pilot Findings from CSUS

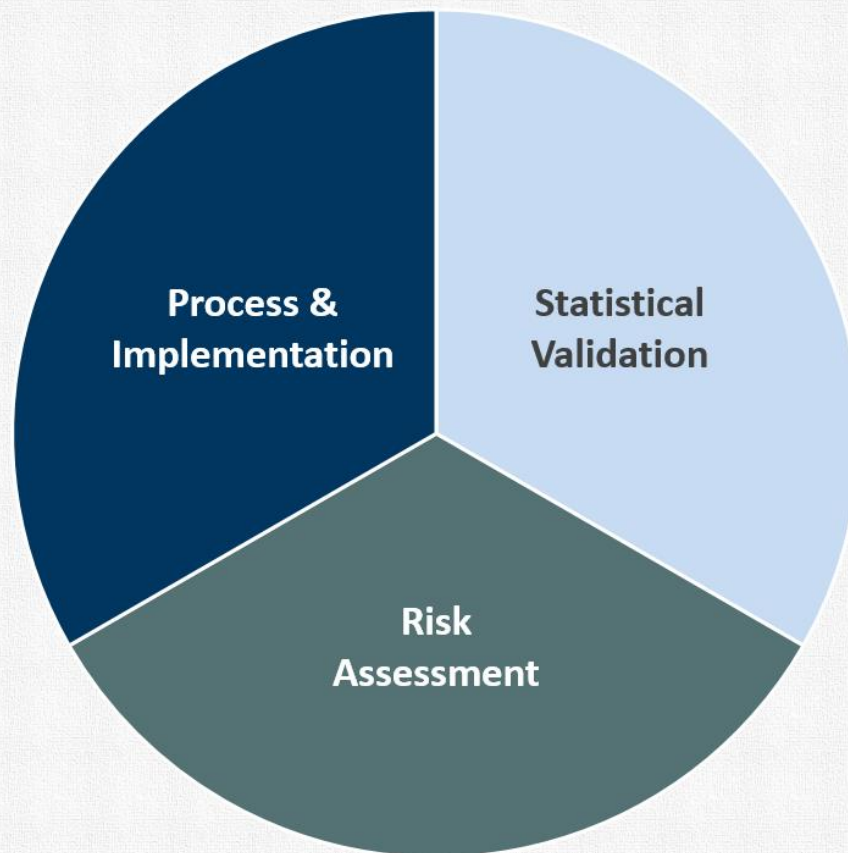
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Community Care Licensing Division
Data updated 2/15

Tool Development

A Balanced Approach to Tool Development:

- Considerations for Statistical Validity
- Risk Assessment and Review by Subject Matter Experts
- Considerations for Process and Implementation/Practicality



Approach to Validation

- Consider information from multiple data sources
 - Post-Inspection Licensee and LPA Surveys
 - LPA Focus Groups
 - Pilot Inspection Results
 - Historical Inspection Data – Frequency of Citations
 - Research from Other States (Primarily Child Care)

RCFE Pilot Data

- Survey and focus group results
 - Help validation by ensuring tools contain the right content
 - Suggest improvements for ease of use in practice
 - Inform training to increase standardization, consistency, quality of inspection results
- Inspection results
 - Help validation by identifying critical and important content
 - Help validation by suggesting how tools should be structured
 - Inform training to increase standardization, consistency, quality of inspection results

Moving Toward Prevention: Licensee Survey Results

- 75% thought new process helpful. What they liked:
 - Increased their understanding of statutes and regs.
 - Information in the pre-inspection checklist, entrance conference, and tool.
 - Supportive, professional relationships with LPAs and helpful information provided by LPAs.
 - Thoroughness of the inspection.
 - Increased focus on clients and the purpose of operating facilities.
- 60% thought the new process was too long.
- 50% received at least 1 citation.
 - 55% of this group said the number of citations received was the same as in the past, 28% reported they received a greater number, 17% a lower number.

Moving Toward Consistency: LPA Post-Inspection Survey Results

- About 80% of LPAs reported the new process was more thorough and promotes consistency.
- What they liked:
 - Easy access to regulations, comprehensiveness
 - Tablet, stylus, check boxes, auto-population
 - Opportunities to engage in dialog with facilities
- About 90% thought the process was too long.
- What they didn't like:
 - Issues with holding/using tablet, mismatch between inspection process and organization of content, redundancies, length, technical bugs
- They provided detailed ideas to improve content, process and user experience.

Digging Deeper: LPA Focus Group Findings

- Sessions gathered more detail on inspection process, organization, content, redundancies
- Most LPAs said practice is changing
 - More thorough – review more regulations each visit
 - More consultative – increased dialog on regulations
 - More deliberative – pause to consider what is most appropriate: Type A or B deficiency, TV or TA
- Variation in LPA practice of issuing deficiencies, violations, advisories still exists
- Obtained more detailed information to improve content, organization and functioning of tools

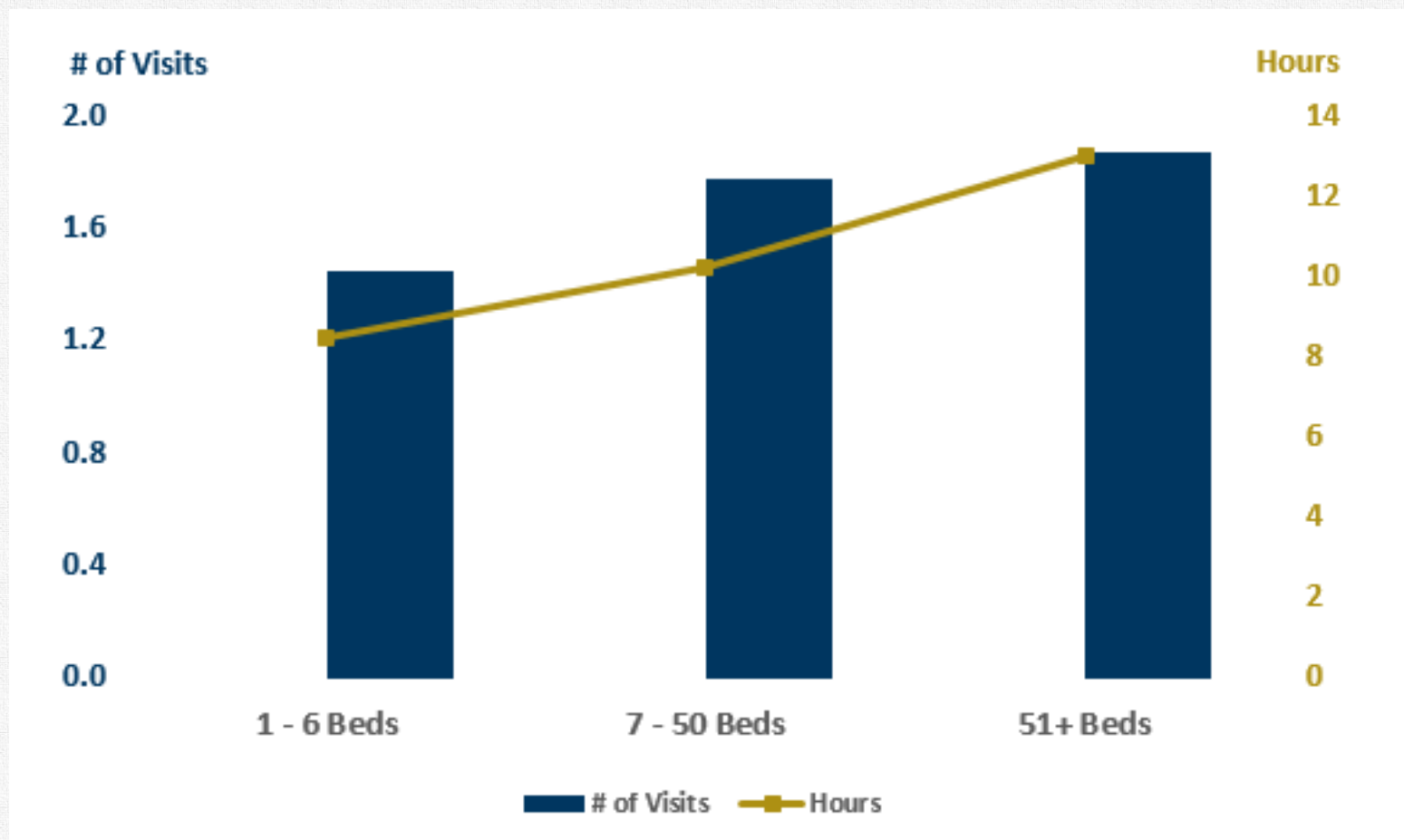
Pilot Methods

- A total of 201 inspections
- 18 pre-licensing inspections (excluded from analyses)
- 19 inspections with shadow LPM (for inter-rater reliability)
- 4 inspections excluded due to missing data
- A total of 179 facilities included in pilot inspection data analysis

Practice Was Consistent: Acceptable Level of Inter-rater Agreement

- Inter-rater agreement in main regulations = 76%
 - The most common disagreement was a YES/BLANK combination, which accounts for 15.9%
- Inter-rater agreement in specialty tools = 61%
- Combined agreement (Main + Specialty) = 74%
 - Issues arose due to many blanks in the ratings
 - This can be remedied with changes in programming and training

Average Inspection Length



Commonly Cited Regulations

- **Physical Plant/Environmental Safety (Most A citations):**
 - **87309(a):** Cleaning solutions, poisons, etc. inaccessible
 - **87303(e)(2):** Hot water temperature
 - 87309(b): Medicines stored safely and separately
- **Personnel Records/Staff Training (Most B citations):**
 - 1569.625(b)(1): Training requirements before working independently with residents and within the first four weeks of employment
 - 1569.625(b)(2): Additional annual 20 hours of training for staff
 - **87411(c)(1):** Appropriate first aid training

On 2017 Most Common Deficiencies List

More Study: Comparison of Citation Counts Across Years

- We compared count and average of citations issued per facility in pilot to data for all facilities FY 2015 – FY 2017.
- Type A down approximately 29% and Type B up approximately 60% from past 3 year average.
- Both Type A and Type B citations have shown a downward trend from 2015 to 2017.

Calendar Year	Deficiencies Cited			Number of Facilities Inspected	Average Per Inspection		
	Type A	Type B	Total		Type A	Type B	Total
2015	2,344	3,539	5,883	2,195	1.1	1.6	2.7
2016	3,708	5,613	9,321	3,957	0.9	1.4	2.4
2017	4,455	6,688	11,143	5,301	0.8	1.3	2.1
Pilot	117	410	527	179	0.7	2.3	2.9

Citations and Advisory Notes by Domain

		Citation Types		Advisory Notes		Total
		A	B	TV	TA	
Domain	1 Disaster Preparedness	0	2	9	14	25
	2 Food Service	4	14	10	17	45
	3 Incidental Medical and Dental	24	37	24	15	100
	4 Operational Requirements	11	30	53	78	172
	5 Personnel Records/Staff Training	16	110	107	48	281
	6 Physical Plant/Environmental Safety	52	44	31	34	161
	7 Planned Activities	0	2	3	9	14
	8 Resident Records/Incident Reports	0	63	47	89	199
	9 Resident Rights/Information	0	8	9	26	43
	10 Residents with Special Health Needs	9	84	53	32	178
	11 Staffing	1	16	4	10	31
Total		117	410	350	372	1249
*Pre-licensing visits excluded.						

- **Physical Plant/Environmental Safety**, which tended to take the most time, also had the most A violations.

Next Steps for Tool Development

- Internal Structure
 - Analyzing patterns of co-violations to aid in determining which regulations to include in the (shorter) standard tool
- Content
 - Mandated regulations **MUST** be included
 - SME decisions
 - Criticality/risks resulting from violation of reg
 - Adequate representation of regs v. redundancies in each domain on the (longer) comprehensive tool
 - Logistical considerations such as the time required to complete inspections based on the number of regulations included

Long-Term Focus

- Shift focus from enforcement to health and safety of each individual through prevention, enforcement, and compliance.
 - Support consistent inspections: develop standardized, thorough and valid tools that help set clear expectations for providers.
 - Develop actionable information: analyze data on facility compliance and noncompliance to direct resources where needed.
 - Design CQI process: continue data analysis to ensure we maintain a holistic and accurate picture of the health of a facility over time.
 - Identify promising practices: understand what works as well as areas for training and improvement.